



Citizens Television, Inc.

Comcast Channels 26, 27, 96.

Hamden, New Haven and West Haven (CT)

www.citizenstv.org

August 7, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

Citizens Television, Inc. submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Citizens Television, Inc is a 501(c)(3) organization providing PEG Channels programming to 65,000 households in New Haven, Hamden and West Haven Connecticut. Our programming is 24/7/365, and covers a wide range of local origination programming, satellite feeds and access centers exchanging programs of mutual interest to our communities.

We carry one hundred & eighty (180) programs weekly on our channels, of which an increasing number are closed captioned. The onscreen video programming guide of our multichannel video programming distributor (MVPD), Comcast, does not provide a label or symbol indicating which of our programs have closed captions, nor a description of any of our programming despite our repeated request for full signage of all of our programming and offer to pay for the service. We are told by Comcast that neither they nor their signage company is willing to take on the bookkeeping responsibility even though we offered to pay in full for the year.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Comcast, only provides a simple tag that says "Public Access Programming," "Educational Programming," or "Government Programming." Comcast has even refused to put a simple tag of our website, where viewers could consult the Program Guide. While such would be difficult for many viewers and inconvenient for others, it is better than nothing. As it now stands, this level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

Our community is also served by AT&T's U-verse multichannel video service, which has created unique and especially difficult problems for visually-impaired viewers wishing to view PEG channel programming that are discussed in the comments filed by the Alliance for Communications Democracy, the Alliance for Community Media, and Chicago Access Corporation (CAN TV). Unlike the linear PEG channels on our incumbent cable operator's system, which the visually impaired can reach simply by remembering the right channel number **[(26, 27 and 96)]**, with AT&T's PEG product the visually impaired must somehow, after punching in channel 99, figure out how to visually navigate a series of menus and sub-menus just to reach any of the PEG channels. The more PEG channels in the DMA and the more PEG channels in each jurisdiction, the more sub-menus the visually impaired must somehow figure out how to "see" and navigate.

In our area, AT&T has **18** different local jurisdictions, and a total of **44** different PEG channels, on its "channel 99" PEG application. As a result, a visually-impaired subscriber, after inputting channel 99 and waiting for it to load, must somehow visually navigate a menu of **18** different local community jurisdictions and find and press the correct one, and then after that, visually navigate a sub-menu of **44** different PEG channels, and find and press the correct one, to reach their PEG channel. Moreover, AT&T PEG product's lack of a truly effective "last channel" function for PEG creates yet more problems for the visually impaired if they wish to go to or from a PEG channel from or to a non-PEG channel to another. In short, the visually impaired are genuinely, and dramatically, disadvantaged compared to the non-visually impaired in accessing, and being able to have the same functionality with respect to, PEG channels on AT&T's U-verse system.

We urge the Commission to adopt rules that would require video programming guides and menus and signage which display channel and program information for all channels, and include high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Yours truly,

Joseph L. Schofield
Executive Director